UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:	PROMESA Title III
THE FINANCIAL OVERSIGHT AND	
MANAGEMENT BOARD FOR PUERTO RICO,	
as representative of	No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, et al.,	(Jointly Administered)
Debtors. ¹	
X	

INFORMATIVE MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT BOARD REGARDING JUNE 29–30, 2022 OMNIBUS HEARING

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court's *Order Regarding Procedures for June* 29–30, 2022, *Omnibus Hearing* [Case No. 17-3283, ECF No. 21264], the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA"), respectfully states as follows:

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

- 1. The following parties will appear on behalf of the Oversight Board: (i) Martin J. Bienenstock, mbienenstock@proskauer.com; (ii) Brian S. Rosen, brosen@proskauer.com; (iii) Laura Stafford, lstafford@proskauer.com; (iv) Scott P. Cooper, scooper@proskauer.com; and (v) Daniel Desatnik, ddesatnik@proskauer.com of Proskauer Rose LLP.
- 2. Martin J. Bienenstock and Brian S. Rosen of Proskauer Rose LLP will appear to address questions and comments, if any, related to the Oversight Board's status report.
- 3. Brian S. Rosen and Laura Stafford of Proskauer Rose LLP will appear and seek to be heard on the *Four Hundred Fifty-Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Misclassified Claims* [Case No. 17-3283, ECF No. 20789] (the "Four Hundred Fifty-Eighth Omnibus Objection") with respect to Proof of Claim Nos. 24320 and 17738 and the *Four Hundred Sixty-Eighth Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Subsequently Amended Claims* [Case No. 17-3283, ECF No. 20799] (the "Four Hundred Sixty-Eighth Omnibus Objection") with respect to Proof of Claim No. 11464, as well as any and all related objections, responses, statements, joinders, and replies to the Four Hundred Fifty-Eighth Omnibus Objection and Four Hundred Sixty-Eighth Omnibus Objection.
- 4. Scott P. Cooper of Proskauer Rose LLP will appear and seek to be heard on *Cobra Acquisitions LLC's Motion to Lift Stay Order* [Case No. 17-3283, ECF No. 21145] (the "Cobra Motion"), as well as any and all related objections, responses, statements, joinders, and replies to the Cobra Motion.
- 5. Daniel Desatnik of Proskauer Rose LLP will appear and seek to be heard on *PV Properties, Inc.'s Motion for Relief from the Automatic Stay* [Case No. 17-4780, ECF No. 2779]

(the "<u>PV Properties Motion</u>"), as well as any and all related objections, responses, statements, joinders, and replies to the PV Properties Motion.

6. Martin J. Bienenstock, Brian S. Rosen, Laura Stafford, Scott P. Cooper, and Daniel Desatnik, reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of the Oversight Board or any of the Debtors in these Title III cases.

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WHEREFORE, the parties respectfully request that the Court take notice of the foregoing.

Dated: June 23, 2022 San Juan, Puerto Rico Respectfully submitted,

/s/ Martin J. Bienenstock

Martin J. Bienenstock

Brian S. Rosen

Paul V. Possinger

Ehud Barak

(Admission *pro hac vice*)

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EXHIBIT A

PARTY APPEARANCE COVER SHEET

PARTY APPEARANCE COVER SHEET

Name of Party	Financial Oversight and Management Board for Puerto Rico
Party Name Abbreviation	FOMB
(For Use with Zoom)	LOMB
Omnibus Hearing Participant	
Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): • Name, • Email, • Law Firm, • Phone Number • Docket Entry No. for the Attorney's Notice of Appearance • Zoom Screen Name	Martin J. Bienenstock mbienenstock@proskauer.c om Proskauer Rose LLP 212-969-4530 Docket Entry No. 90 FOMB/ Bienenstock, Martin/ Proskauer Rose LLP
	Brian S. Rosen brosen@proskauer.com Proskauer Rose LLP 212-969-3380 Docket Entry No. 1902 FOMB/ Rosen, Brian/ Proskauer Rose LLP
	Laura Stafford lstafford@proskauer.com Proskauer Rose LLP 617-526-9714 Docket Entry No. 4967 FOMB/ Stafford, Laura/ Proskauer Rose LLP
	Scott P. Cooper scooper@proskauer.com Proskauer Rose LLP 310-284-5669 Docket Entry No. 8222 FOMB/ Cooper, Scott/ Proskauer Rose LLP

Case:17-03283-LTS		
		Daniel Desatnik ddesatnik@proskauer.com Proskauer Rose LLP 212-969-3191 Docket Entry No. 7835 FOMB/ Desatnik, Daniel/ Proskauer Rose LLP